

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(NORTHERN DIVISION)

DOREEN HENRY, *et al.*

\*

*Plaintiffs,*

\*

Case No.: 1:23-cv-01285-SAG

v.

\*

TERRANCE HALL, *et al.*

\*

*Defendants.*

\*

\* \* \* \* \*

**AFFIDAVIT OF VERONICA J. MINA, ESQ.**

I, Veronica J. Mina, Esq., am over the age of 18 and competent to testify to the matters set forth herein, and am not a party to this action.

1. I am a practicing attorney in good standing in the State of Maryland. I am also admitted to practice in the District of Columbia (as of March 13, 2023) as well as the United States District Courts for the District of Maryland and the District of Columbia.

2. I graduated from the University of Maryland Francis King Carey School of Law in May 2021. I was admitted to the Maryland Bar in December 2021.

3. Following graduation from law school, I clerked for three judges in the Circuit Court of Maryland for Anne Arundel County: Judge William C. Mulford, II; Judge Lynne A. Battaglia (retired judge of the Maryland Supreme Court); and Judge Michael E. Malone, from August 2021 through September 2022.

4. Following the end of my clerkship, I have been employed as an associate attorney at Kagan Stern Marinello & Beard, LLC in Annapolis, Maryland since October 2022.

5. My practice includes litigating complex civil disputes, including those in the employment industry, estates industry, construction industry, and business/corporate context. My litigation practice includes matters throughout Maryland, Washington D.C., as well as the United States District Courts for the District of Maryland and the District of Columbia.

6. I represent Doreen Henry and Roger Kerr ("Plaintiffs") in the above-captioned matter.

7. In connection with my engagement in this matter, Plaintiffs have incurred \$7,965.00 in attorney's fees and \$40.09 in costs from the law firm where I am employed, Kagan Stern Marinello & Beard, LLC since Defendants' failure to provide discovery Answers to Interrogatories, Responses to Requests for Documents, Responses to Requests for Admissions, and their document production on or about April 29, 2024 (for a total of \$8,005.09 since April 29, 2024). A true and accurate copy of Plaintiffs' billing record as it relates to Defendants' discovery failures and efforts to obtain a judgment by default against Defendants is attached to the Petition for Attorneys' Fees as **Exhibit 2**.

8. The account ledger attached as Exhibit 2 to the Petition for Attorneys' Fees was generated from the business records that the firm maintains in the ordinary course of business, and reflects the time incurred in this matter from its inception.

9. In connection with these fees after Defendants' initial failure to provide discovery on April 29, 2024, I have worked approximately 25.3 total hours. The hours billed included drafting and filing the Consent Motion to Modify the Scheduling Order and the Motion to Compel and for Contempt/Sanctions against Defendants, attending a Motions Hearing to obtain a default judgment against Defendants, significant communications with the Defendants regarding their

discovery failures, general communications with Plaintiffs regarding the status of this matter, and drafting a petition for fees pursuant to the Default Judgment Order.

10. The time expended, as reflected in Exhibit 2 to the Petition for Attorneys' Fees, was necessary for the representation of Plaintiffs in this matter and to accomplish the desired result of obtaining a judgment against the Defendants by default.

11. The time spent in representation of Plaintiffs in this regard was fair and reasonable given the required tasks and the resulting outcome.

12. I am one of three attorneys at my firm to work on this matter. Partners Jonathan P. Kagan and Michael J. Marinello also provided oversight and assistance on this matter. On the ledger/invoice, "JPK" represents time entries for Jonathan P. Kagan, "MJM" represents time entries for Michael J. Marinello, and "VJM" represents my time.<sup>1</sup>

13. I am familiar with the range of fees charged by attorneys for civil litigation in Maryland.

14. My current hourly rate for Plaintiff is \$300.00/hour. Jonathan P. Kagan and Michael J. Marinello's hourly rate is \$425.00/hour.

15. Given my years of experience in the practice of law, which has primarily been focused on business, employment, estates, and other civil litigation, my hourly rate is fair and reasonable and commensurate with the hourly rate charged by my peers with similar experience.

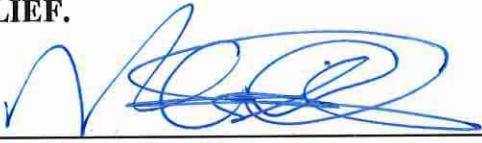
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<sup>1</sup> Although an attorney of record in this case, Jonathan P. Kagan, Esquire did not bill any time to this matter during the relevant time period.

16. Given the relative complexity of this matter, the hours devoted to this litigation are fair and reasonable relative to the experience level of the affiant and all fees and costs were necessary to protect Plaintiffs' interests.

**I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE FOREOING AFFIDAVIT ARE TRU TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.**

7/22/2024  
DATE

  
Veronica J. Mina, Esq.